

FILED

JUL 25 2014

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**Phil Lombardi, Clerk
U.S. DISTRICT COURT**

UNITED STATES OF AMERICA**Plaintiff,****vs.****CHARLES JASON MORELAND,****Defendant.**Case No. 14-mj-132-FHM**COMPLAINT**

**[COUNT 1: 18 U.S.C. §§ 115(a)(1)(B)
and 115(b)(4) – Influencing, Impeding,
and Retaliating Against a Federal**

Official;

**COUNT 2: 18 U.S.C. §§ 115(a)(1)(A)
and 115(b)(4) - Influencing, Impeding,
and Retaliating Against the Immediate**

Family of a Federal Official;**COUNT 3: 18 U.S.C. § 875(c) -**

**Interstate Communications Containing
Threats to Injure]**

COUNT ONE**[18 U.S.C. §§ 115(a)(1)(B) and 115(b)(4)]**

From on or about April 15, 2014, through on or about April 18, 2014, in the Northern District of Oklahoma, the defendant, **CHARLES JASON MORELAND**, threatened to assault and murder United States Senator Harry Reid with intent to impede, intimidate, and interfere with Senator Reid while engaged in the performance of his official duties, and with intent to retaliate against Senator Reid on account of the performance of his official duties.

All in violation of Title 18, United States Code, Sections 115(a)(1)(B) and 115(b)(4).

COUNT TWO
[18 U.S.C. §§ 115(a)(1)(A) and 115(b)(4)]

On or about April 18, 2014, in the Northern District of Oklahoma, the defendant, **CHARLES JASON MORELAND**, threatened to assault and murder the immediate family of United States Senator Harry Reid with intent to impede, intimidate, and interfere with Senator Reid while engaged in the performance of his official duties, and with intent to retaliate against Senator Reid on account of the performance of his official duties.

All in violation of Title 18, United States Code, Sections 115(a)(1)(A) and 115(b)(4).

COUNT THREE
[18 U.S.C. § 875(c)]

From on or about April 15, 2014, through on or about April 18, 2014, in the Northern District of Oklahoma, the defendant, **CHARLES JASON MORELAND**, transmitted in interstate and foreign commerce communications containing threats to injure United States Senator Harry Reid.

All in violation of Title 18, United States Code, Section 875.



LOEL EVERS SKOCH, Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this 25th Day of July, 2014.



FRANK H. McCARTHY
United States Magistrate Judge

IN THE UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF OKLAHOMA

IN THE MATTER OF THE SEARCH OF:
RESIDENCE OF 6210 EAST 72ND
STREET APARTMENT NUMBER 1124

Case No. _____

**AFFIDAVIT IN SUPPORT OF AN
APPLICATION UNDER RULE 41 FOR A
WARRANT TO SEARCH AND SEIZE**

I, the undersigned, being duly sworn, hereby depose and say as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I, Loel Skoch, hereafter referred to as Affiant, make this affidavit in support of an application, under Rule 41 of the Federal Rules of Criminal Procedure, for a search warrant authorizing the search of the residence located at 6210 East 72nd Street, Apartment 1124, Tulsa, Oklahoma, and the seizure and examination of property, to wit, electronic devices, and the extraction of electronically stored information, as described in Attachment A, from that property.

2. Affiant is a law enforcement officer as defined by Rule 41 of the Federal Rules of Criminal Procedure, and is currently employed by the Federal Bureau of Investigation as a Special Agent. Affiant has been so employed since February of 2011, and prior to that, began his law enforcement career as a uniformed police officer in 2004.

3. Affiant is currently assigned to the Oklahoma City Field Office, Tulsa Resident Agency. As a Special Agent, Affiant's duties include but are not limited to

conducting federal criminal investigations concerning violent crimes, bank robberies, threats against public officials, and crimes committed in or pertaining to Indian Country.

4. Affiant has previously participated in investigations pertaining to threats against public officials including but not limited to violations of Title 18, United States Code, Sections 115 and 875.

5. This affidavit is intended to show only that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

6. The information set forth in this Affidavit is known to the Affiant by his communications with other law enforcement personnel or through his own investigation.

7. Affiant is investigating the activities of **CHARLES JASON MORELAND**. As will be shown below, there is probable cause to believe from on or about April 15, 2014, through April 18, 2014, **MORELAND**:

a. Threatened to assault United States Senator Harry Reid with intent to impede, intimidate, and interfere with Senator Reid while engaged in the performance of his official duties, and with intent to retaliate against Senator Reid on account of the performance of his official duties, in violation of Title 18, United States Code, Section 115(a)(1)(B);

b. Threatened to assault United States Senator Harry Reid's family with intent to impede, intimidate, and interfere with Senator Reid while engaged in the performance of his official duties, and with intent to retaliate

against Senator Reid on account of the performance of his official duties, in violation of Title 18, United States Code, Section 115(a)(1)(A);

c. Transmitted in interstate and foreign commerce communications containing threats to injure United States Senator Harry Reid, in violation of Title 18, United States Code, Section 875.

IDENTIFICATION OF THE RESIDENCE

8. MORELAND's residence is part of the South Slope Apartment complex. The address is 6210 East 72nd Street, Tulsa, Oklahoma. MORELAND's apartment has light tan siding and brick towards the front of the apartment. The apartment building is clearly labeled with a sign that reads "6210 E. 72nd ST SOUTH" The entrance to MORELAND's apartment is clearly labeled "1124". See attachment "B" for photographs of MORELAND's residence.

9. The applied-for warrant would authorize the search of the named address and the seizure and subsequent forensic examination of any electronic devices found in order to identify electronically stored data, as more particularly described in Attachment A.

PROBABLE CAUSE

10. On September 28, 2013, an individual identified as "Charles Moreland" and using the email address of "charlie@messeman.net" sent an e-mail to the White House indicated that he would travel to Washington, D.C. and start killing people if the monitoring of his internet and cell phones did not stop. "Charles Moreland" stated in the email that President Obama should be killed or thrown in prison for fraud and abuse. The

United States Secret Service identified the sender of the threatening e-mail as MORELAND. As a result of the threatening e-mail, United States Secret Service Special Agent Robert Idoux contacted MORELAND for the purpose of conducting a threat assessment. Special Agent Idoux directed MORELAND to stop making threats and resume taking his medication. Subsequent to the threat, an FBI Task Force Officer utilized the United States Capitol Police (“USCP”) Threat Assessment Section (“TAS”) database to document the fact that MORELAND had sent a threatening e-mail indicating he would show up in Washington, D.C., and kill people.

11. The USCP-TAS database also contains an entry on June 23, 2014, documenting five webform messages from MORELAND utilizing the same e-mail address (Charlie@messem.net) to United States Congressman Jim Bridenstine. Congressman Bridenstine’s office received MORELAND’s angry/threatening messages beginning on or about September 5, 2013, through June 20, 2014. MORELAND’s messages included statements such as:

a. On September 23, 2014: “PLEASE FORWARD THIS TO ALL OF CONGRESS. WE DIDN’T BOTHER EDITING WE HATE YOU THAT MUCH ... YOUR ALL TRESPASSING AND HAVE COMMITTED FRAUD ... UNDER WHAT AUTHORITY DO ANY OF YOU DO ANYTHING? I REVOKED SUCH AUTHORITY ... NOW I GET TO SCREW YOU FOR SCREWING ME ... I own this whole fucking place and you all have pissed me the fuck off. Royally ... I am dead fucking serious. I hate each and every one of you. I would hang all of you but they

may not let me do that ... I am fully competent ... I am really fucking pissed off. So your all going to get fucked by an animal ... I AM COMPLETELY SANE. I JUST REALLY FUCKING HATE ALL OF YOU. I DON'T LIKE DOLT'S WHO PLUNDER ... YOU HAVE COMMITTED FRAUD AND TREASON AGAINST ME ... I WILL NOT TOLERATE ANY MORE BULLSHIT ... THIS IS NOT OVER UNTIL I FUCKING SAY IT IS OVER."

b. On June 6, 2014: "I would say you Bastards have some answers to provide ... YOU WILL FUCKING ANSWER. GET YOUR SHIT TOGETHER AND RESPOND."

c. On June 20, 2014: "You are no different than the rapist, murderer or thief. You will answer. I PROMISE YOU THAT."

12. In or about April 2014, law enforcement officials became aware that Senator Harry Reid had received threats via his congressional webpage.

a. On April 15, 2014, at 5:01 p.m., Senator Reid received the following message: "YOU'RE A DEAD FUCKING MAN HARRY REID!!!!!! A DEAD MAN!!!!!"

b. On April 18, 2014, at 10:57 a.m., Senator Reid received the following message: "TELL THAT PIECE OF SHIT HARRY REID IF HE EVER STEPS FOOT OUT OF D.C. HE WILL BE DONE... WE ARE DONE HEARING HIS BS AND USELESS BANTER... AGAIN, MAKE NO MISTAKE... DON'T DISCOUNT THIS MESSAGE... HARRY REID

NEEDS TO RESIGN IMMEDIATELY OR FACE STERN, HARSH, UNIMAGINABLE CONSEQUENCES TO HIM AND HIS FAMILY... IF HE OPENS HIS MOUTH AGAIN WE WILL TAKE ACTION AGAINST HIM AND HIS FAMILY IMMEDIATELY... LEARN TO SHUT THE FUCK UP..... WE ARE NOT FUCKING PLAYING WITH YOU....”

c. The writer of the above reference messages identified himself as “Thomas Payne” and provided a false address in Nevada. Law enforcement officials identified the incoming Internet Protocol (IP) address as 107.141.41.64, and submitted a subpoena to AT&T U-Verse.

13. On July 10, 2014, Special Agent Steven Van Alstine, USCP TAS, advised Affiant that he received the subpoena results from AT&T U-Verse identifying the subscriber of IP address 107.141.41.64. According to the subpoena results, the account is in Charles MORELAND’s name, and the e-mail address associated with the account is “charlesjmoreland@att.net.” The account appears to be paid by Susan Moreland and the service and billing address is 6210 E 72nd St S, Tulsa, OK 74136. The previous service address for the account was 10014 S Maplewood Ave, Tulsa, OK 74137.

16. Open source checks revealed that Susan Moreland previously lived at 10014 S Maplewood Ave, Tulsa, Oklahoma, and that she currently lives at 6210 E 72nd St, Apt 1124, Tulsa, OK 74136. Open source checks also revealed that MORELAND’s last known address was 10014 S Maplewood Ave, Tulsa, Oklahoma.

ELECTRONIC STORAGE AND FORENSIC ANALYSIS

17. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit the search of MORELAND's residence and the seizure and examination of devices consistent with the warrant. The examination may require authorities to employ techniques including but not limited to computer-assisted scans of the entire medium that might expose many parts of devices to human inspection in order to determine whether it is evidence described by the warrant.

CONCLUSION

I submit that this affidavit supports probable cause for a search warrant authorizing the search of the residence located at 6210 East 72nd Street, Apartment 1124, Tulsa, Oklahoma, and the seizure and examination of the devices described in Attachment A.

Respectfully submitted,



LOEL EVERS SKOCH
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on July 25, 2014.



FRANK H. MCCARTHY
UNITED STATES MAGISTRATE JUDGE